

1 **PARKER DANIELS KIBORT**

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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF ARIZONA**

26 Kari Lake; Mark Finchem,

27 No. 22-cv-00677-JJT
28 (Honorable John J. Tuchi)

Plaintiffs,

v.

Kathleen Hobbs, as Arizona Secretary of State;
Bill Gates; Clint Hickman; Jack Sellers;
Thomas Galvin; and Steve Gallardo, in their
capacity as members of the Maricopa County
Board of Supervisors; Rex Scott; Matt Heinz;
Sharon Bronson; Steve Christy; Adelita
Grijalva, in their capacity as members of the
Pima County Board of Supervisors,

Defendants.

**PLAINTIFFS' EXPEDITED REQUEST
FOR PERMISSION TO SUPPLEMENT
RECORD IN LIGHT OF RECENTLY
OBTAINED INFORMATION**

1 Plaintiffs Kari Lake and Mark Finchem hereby request permission to file a sworn
2 declaration of Ms. Shelby Busch, with supporting exhibits, to supplement the record of
3 the hearing in this matter held on July 21, 2022. Plaintiffs have just learned (post the July
4 21 hearing), that Ms. Busch possesses recorded video from Maricopa County cameras
5 monitoring the Election Management System (EMS) server computer room. Ms. Busch
6 also obtained through public records requests copies of Maricopa County's logs showing
7 access to the server room. Plaintiffs understand that the records reflect who has badge
8 access and who does not. Plaintiffs also understand that the video and data obtained
9 shows several different individuals without badge access to the server room nonetheless
10 gaining access to the room through various means including being allowed access to the
11 room by persons with a badge. The information also shows unauthorized individuals
12 being in the server room alone which violates security protocol. Plaintiffs understand that
13 the information not only shows access to the room but also actual access to the EMS
14 system by unauthorized personnel. This evidence directly relates to the testimony of Scott
15 Jarrett concerning the security of the EMS server room and security regarding the EMS
16 system itself.

17 Plaintiffs request permission to file a declaration from Ms. Busch together with
18 exhibits consisting of the video footage, access logs, and other related data. If this request
19 is granted, Plaintiffs will only need 1-2 days to make the submission.
20

21 DATED: August 2, 2022

PARKER DANIELS KIBORT LLC

22 By /s/ Joseph A. Pull

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 2, 2022, I electronically transmitted
3 the foregoing document to the Clerk's Office using the CM/ECF System for
4 filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants on
5 record.

6
7 */s/ Andrew D. Parker*

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